

**COMMENTS FROM THE AMEREN ILLINOIS UTILITIES
CONCERNING THE ORMD STRAWMAN
VERSION 1.1**

Submitted January 21, 2009

The Ameren Illinois Utilities (AIU) wish to thank Staff for the opportunity to provide comments on the ORMD Straw Man proposal related to consumer protections. AIU offers the following comments:

Applicability

While Staff has suggested the possibility of using the statutory definition of a small commercial customer at 15,000 kilowatt-hours of electricity annually for purposes of creating the cut-off for various consumer protections, the Ameren Illinois Utilities instead strongly encourage the use of the mass market definition as the consumer protection threshold for several reasons. That is, in the case of the Ameren Illinois Utilities, those customers considered to be eligible for the mass market are those customers with demands less than 150kW, or stated another way, are those customers in the DS1 and DS2 rate classes.

The Ameren Illinois Utilities believe it makes sense to offer consumer protections to the same population of customers that will be marketed to on a mass market basis. To market on a mass market basis which is based on rate class but to only offer consumer protections based on kilowatt-hour usage will create confusion in the market for RES' and consumers. Not only will this complicate customer communications with different messaging to customers within the same rate class, it will also pose a training burden on the Ameren Illinois Utilities' call centers.

Additionally, the Ameren Illinois Utilities have not planned or estimated for a 15,000 kilowatt-hour usage consumer flag and subsequent processing sub-paths in their design and implementation plans since all design efforts have been focused on the rate class distinctions agreed upon early on in the workshops. This major design issue may compromise work completed to-date, cause implementation roll-out delays and may add significant costs to the project.

Again, for the above reasons, the Ameren Illinois Utilities strongly encourage the use of the mass market definition as the threshold for consumer protections.

Application of Payments

The Ameren Illinois Utilities agree with the removal of the Application of Payments section in the revised version of the Straw Man draft since this issue is presently under discussion in the Code 280 workshops.

Other Issues

The AIU's do not have a position on the remainder of issues presented in the Straw Man rule at this time. As a provider of delivery services, the interaction between the RES and the customer where it touches and concerns delivery service functions is our primary concern. As we gain additional insight into the issues presented, the Ameren Illinois Utilities reserve the right to provide additional input or withhold comment relative to the proposed ORMD Straw Man pending discussion at future workshops.

